



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

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February 7, 2012

TO: Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Wendy L. Watanabe
Auditor-Controller

SUBJECT: **PROBATION DEPARTMENT JUVENILE CAMPS - DEPARTMENT OF JUSTICE SETTLEMENT AGREEMENT MONITORING FOR SEPTEMBER 1, 2011 THROUGH NOVEMBER 30, 2011 – FOURTH STATUS REPORT**

On August 17, 2010, your Board instructed the Auditor-Controller (A-C) to monitor the County Probation Department's (Probation) progress toward implementing the provisions of the federal Department of Justice (DOJ) settlement agreement. This is our fourth status report. The settlement agreement covers eighteen Probation camps and six specialized units. However, five of the camps were not open during the current review period. In addition, at the time of our review, Probation was revising the monitoring tool for one specialized unit. As a result, our review was limited to thirteen camps and five specialized units.

We are responsible for monitoring the status of 23 of the 41 provisions from the DOJ settlement agreement. Twelve of the other eighteen provisions are being monitored by the County Department of Mental Health (DMH) because they require a mental health specialist, three provisions are administrative issues that do not require formal monitoring, and Probation indicated that we are no longer responsible for monitoring the three remaining provisions. Specifically, Probation indicated that the DOJ is relying on their own observations and the results of Probation's internal reviews to evaluate compliance with Provision 9 - Protection from Abusive Institutional Practices; Provision 13 - Threats and Intimidation; and Provision 22 - Classification. In addition, the DOJ Monitor approved these provisions for formal monitoring effective October 31, 2011.

We evaluated Probation's progress in implementing the provisions we are responsible for using monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools include specific criteria, which result in a precise score. Because Probation and the DOJ Monitor had not developed monitoring tools for four of the 23 provisions we monitor before the start of our review, our review was limited to 19 provisions. In addition, because of the differences in juvenile populations and services among Probation's camps and units, some of the settlement agreement provisions only apply to some of the camps/units.

When the DOJ Monitor determines that Probation has met most of a provision's requirements, the DOJ monitor will then authorize placing the provision into "formal monitoring", and will continue to track Probation's compliance. If Probation continues to meet the requirements of the provision for twelve consecutive months, the DOJ Monitor will consider Probation to have completed formal monitoring (fully implemented) for that provision. The settlement agreement requires the County to fully implement all of the provisions by October 2012.

Results of Review

Our review disclosed that Probation continues to make progress in complying with the 19 provisions we monitored. As noted in the following table, Probation completed the formal monitoring process for three (16%) of the 19 provisions, meaning that DOJ considers those three provisions to be fully implemented. Our review indicates that Probation was also in substantial compliance (compliance level of 90% or more) with ten (53%) of the 19 provisions; had a compliance level of 70% to 89% for five (26%) provisions; and a compliance level of 69% or less for only one (5%) provision.

Compliance Level	Number of Provisions			
	As of Feb 28, 2011	As of May 31, 2011	As of Aug 31, 2011	As of Nov 30, 2011
Completed the Formal Monitoring Process	0	0	0	3
90% or higher	3	6	9	10
70% to 89%	4	7	5	5
69% or less	11	5	3	1

The table above shows the compliance levels for all the provisions we monitored. It should be noted that the compliance level for one provision (Provision 45 - Staff Understanding of Mental Health and Developmental Disability Needs) was lower in our current review, compared to our prior review. Probation explained that the discrepancy

was because of the timing of our review. Specifically, the Department indicated that they completed training Department staff on the requirements of this Provision during October 2011, and our review only covered the training records through September 2011.

Attachment 1 is the detailed results of our monitoring each provision. Attachment 2 shows the compliance level of each provision in our current review, and the compliance level from our prior reviews. Attachment 3 lists the compliance levels for each provision at each camp/unit.

Review of Report

We discussed the results of our review with Probation management, who generally agreed with the results of our review. They also indicated they will continue to work with the DOJ to implement all of the provisions of the settlement agreement. We thank Probation management and staff for their cooperation and assistance during our review.

Please call me if you have any questions, or your staff may contact Don Chadwick at (213) 253-0301.

WLW:JLS:DC:AA

Attachments

- c: William T Fujioka, Chief Executive Officer
- Jerry E. Powers, Chief Probation Officer
- Calvin C. Remington, Chief Deputy, Probation Department
- Marvin J. Southard, D.S.W., Director, Department of Mental Health
- Mitchell H. Katz, M.D., Director, Department of Health Services
- Arturo Delgado, Ed.D., Superintendent, Los Angeles County Office of Education
- Public Information Office
- Audit Committee

**LOS ANGELES COUNTY PROBATION CAMPS
JUVENILE CAMP DOJ SETTLEMENT AGREEMENT MONITORING RESULTS
FOR SEPTEMBER 1 THROUGH NOVEMBER 30, 2011**

Scope of Review

We are responsible for monitoring 23 of the 41 provisions from the Department of Justice (DOJ) settlement agreement. Twelve of the other eighteen provisions will be monitored by the County Department of Mental Health (DMH) because the provisions require a mental health specialist, three provisions are administrative issues that do not require formal monitoring, and the County Probation Department (Probation) indicated that we are no longer responsible for monitoring the three remaining provisions. Specifically, Probation indicated that the DOJ is relying on the results of their own observations and Probation's internal reviews to evaluate compliance with Provision 9 - Protection from Abusive Institutional Practices; Provision 13 - Threats and Intimidation; and Provision 22 - Classification. The DOJ Monitor approved these provisions for formal monitoring effective October 31, 2011.

We evaluate Probation's progress in implementing each provision using monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools include specific criteria, which result in a precise score. Because Probation and the DOJ Monitor had not developed the monitoring tools for four provisions prior to the start of our review, we could only review 19 of the 23 provisions we are responsible for monitoring.

Our review covered the thirteen camps and five specialized units that were open from September 1 through November 30, 2011.

Provision 10: Use of Force

The County shall develop and implement a comprehensive policy and accompanying practices governing use of force, ensuring that the least amount of force necessary for the safety of staff, youth residents, and visitors is used on youth.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 96%

Comments:

Fifteen (94%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining unit (Challenger Memorial Youth Center [CMYC] Security Unit) achieved a compliance level of 86%. The CMYC Security Unit Director did not ensure that all staff had signed-off on Probation's Safe Crisis Management (SCM) policy. Specifically, 12 (18%) of the 66 active staff at the CMYC Security Unit had not signed-off on the policy.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 11: Oleoresin Capsicum (OC or Pepper) Spray

The County shall develop and implement policies, procedures, and practices to restrict the use of OC spray to appropriate circumstances; enable supervisors to maintain appropriate controls over spray use and storage; restrict the carrying of OC spray to individuals who need to carry and use it; prevent the use of OC spray, wherever possible, on populations for whom its use is contraindicated or contrary to doctors' instructions; and ensure that decontamination occurs properly.

This Provision is only applicable to the CMYC Security Unit, which administers the pepper spray canisters at three camps and two specialized units located at CMYC.

Compliance Level: 90%

Comments:

The Security Unit was in substantial compliance with this Provision. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 12: Use of Force Review

The County shall develop and implement a system for senior management to review use of force and alleged child abuse, so they can use the information to improve training and supervision of staff, guide staff discipline, and make needed policy/programmatic changes.

This Provision applies to thirteen camps and four specialized units.

Average Compliance Level: 94%

Comments:

Fifteen (88%) of the seventeen camps/units achieved substantial compliance of 90% or more. The remaining two camps (Munz and Kilpatrick) achieved an average compliance level of 71%. Generally, the directors at the two camps did not always ensure that supervisors completed their reviews of use of force incidents within five business days, as required. Specifically, three (60%) of the five reviews sampled were completed an average of 11 days late, and one (20%) review was not initiated at the time of our review.

The Camp Munz Director also did not always ensure that supervisors conducted a Child Safety Assessment within the required two-hour timeframe. Specifically, two (67%) of the three minors reviewed were assessed ten days and two hours late, respectively.

In addition, the Camp Kilpatrick Director did not have written minutes for the monthly SCM/Youth on Youth Violence (YOYV) meetings to document the discussion and assessment of SCM and YOYV incidents that took place at the Camp.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 14: Consumption of Alcohol by Staff

The County shall ensure that staff at the Probation Camps do not maintain or consume alcohol at the Camps.

This Provision applies to ten camps and two specialized units, including the CMYC Security Unit, which covers the three camps and two specialized units at CMYC.

Average Compliance Level: 93%

Comments:

Eight (67%) of the twelve camps/units achieved substantial compliance of 90% or more. The remaining four camps achieved an average compliance level of 82%. Specifically, camp directors at the four camps did not conduct random searches for alcohol, drugs, and weapons.

The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 16: Orientation

The County shall ensure that all youth, including those who are disabled or Limited English Proficient, receive orientation sufficient to communicate important information, such as how to access the grievance system, medical care, and mental health services, or report staff misconduct.

This Provision applies to thirteen camps and one specialized unit.

Average Compliance Level: 99%

Comments:

All fourteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor indicated that Probation had fully implemented the requirements of this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year.

Provision 18: Staff Training and Supervision of Youth

The County shall ensure that staff who work with youth residents have the knowledge and skills needed to effectively manage youth, including de-escalation techniques, crisis intervention, youth development, and supervision.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 90%

Comments:

Seven (44%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining nine camps/units achieved an average compliance level of 86%. Probation management developed training classes for staff and supervisors on effectively managing youth, including de-escalation techniques, crisis intervention, and youth development. However, camp directors at the nine camps did not ensure that all supervisors and Probation Officers completed the training. Specifically, 41% of the supervisors and 14% of the Probation Officers assigned to the nine camps did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 19: Reduction of Youth on Youth Violence (YOYV)

The County shall develop and implement strategies for reducing youth on youth violence (YOYV) that includes training staff in appropriate behavior management, recognition and response to gang dynamics, and violence reduction techniques.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 96%

Comments:

Fifteen (94%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp Kilpatrick) achieved a compliance level of 79%. Specifically, the Camp manager did not always ensure that YOYV incident packets contained all the required Special Incident Reports (SIRs). In addition, the Camp director did not have written minutes for the monthly SCM/YOYV meetings to document the discussion and assessment of SCM and YOYV incidents that took place at the Camp.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 20: Child Abuse Reporting

The County shall develop policies, practices, and procedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate external agencies.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 89%

Comments:

Eight (50%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining eight camps/units achieved an average compliance level of 82%. Probation developed policies and procedures to define when staff must report allegations of child abuse or neglect. However, Probation management did not ensure that all staff working at the eight camps/units completed the training. Specifically, 18% of Probation Officers, and 31% of non-peace officer staff from Probation, Juvenile Court Health Services (JCHS), and Los Angeles County Office of Education (LACOE) assigned to the eight camps/units did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 21: Child Abuse Investigation

The County shall develop and implement a system for the timely, thorough, and independent investigation of alleged child abuse. Staff that is the subject of an allegation of child abuse shall be removed from direct youth supervision pending the outcome of the referral or investigation.

This Provision only applies to the Child Abuse Special Investigations Unit (CASIU).

Compliance Level: 84%

Comments:

Generally, Probation staff submitted completed investigations to their supervisors for approval within the required 90-day timeframe. However, one (4%) of the 23 investigations completed from August through October 2011 was not submitted to the supervisor within 90 days. The investigator took 122 days to submit the investigation to their supervisor. In addition, the investigator did not obtain the supervisor's approval to extend the time to complete the investigation.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 23: Grievance System

The County shall develop an effective grievance system to which youth have access when they have complaints, ensure that grievances may be filed confidentially, and ensure that they receive appropriate follow-up, including informing the author of the grievance about its outcome, and tracking implementation of resolutions. The County shall ensure that the grievance system provides youth with a safe avenue to report abuse, staff misconduct, or unfair treatment.

This Provision applies to thirteen camps and two specialized units.

Average Compliance Level: 97%

Comments:

Fourteen (93%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp Gonzales) achieved a compliance level of 80%. The Camp director did not always ensure that supervisors addressed grievances within seven days, as required. Specifically, two (40%) of the five grievances reviewed were addressed an average of 12 days late. In addition, the Camp director did not always ensure that supervisors addressed appealed grievances within three business days, as required. Specifically, two (100%) appealed grievances were resolved an average of ten business days late.

The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 24: Youth Movement Between the Probation Camps or Between the Probation Camps and the County Juvenile Halls

The County shall ensure that movement of youth residents between facilities does not interfere with ongoing testing or provision of medical, mental health, or educational services at the camps, unless court proceedings, treatment, or security needs require such movement.

This Provision applies to thirteen camps and one specialized unit.

Average Compliance Level: 96%

Comments:

Thirteen (93%) of the fourteen camps/unit achieved substantial compliance of 90% or more. The remaining camp (Camp Paige) achieved a compliance level of 73%. Specifically, Camp staff did not record the movement of minors who exited and returned on the same day, as required.

The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining “substantial compliance” with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year.

Provision 25: Development and Implementation of Suicide Prevention Policy

The County shall develop and implement adequate policies, procedures, and practices relating to suicide prevention.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 98%

Comments:

All sixteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining “substantial compliance” with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year.

Provision 29: Documentation of Suicide Precautions

The County shall develop and implement policies, procedures, and practices to ensure that the following information is thoroughly and correctly documented, and provide information to all staff who need to know such information: a) the times youth are placed on and removed from precautions; b) the levels of precautions on which youth are maintained; c) the housing locations of youth on precautions; d) the conditions of the precautions; and the times and circumstances of all observations by staff monitoring the youth.

This Provision applies to thirteen camps and two specialized units. Specifically, Provision 29 is comprised of three separate monitoring tools covering mental health needs (29A), and suicidal minors requiring an increased level of supervision (29B and 29C). The overall compliance percentage for this Provision is calculated by averaging the scores for the three tools at each of the applicable camps/units. Because of the differences in juvenile populations and services provided among Probation’s camps and units, Tools 29B and 29C only apply to some of the camps/units.

Average Compliance Level: 82%

Comments:**29A – Mental Health Needs**

Four (27%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining eleven camps/units achieved an average compliance level of 72%.

Specifically, staff at the eleven camps did not always initial the required documents acknowledging that they reviewed DMH's mental health assessments describing the minors' mental health needs.

29B – Enhanced Supervision Level 3

This Provision applies to the four camps/units that had minors on Level 3 Enhanced Supervision (Level 3 Supervision) at the time of our review. Level 3 Supervision is required for minors who are at high risk of suicide.

Three (75%) of the four camps/units achieved substantial compliance of 90% or more. The remaining unit (CMYC Special Housing Unit [SHU]) achieved a compliance level of 87%. CMYC SHU managers did not always ensure that Enhanced Supervision Observation Forms were completed for each eight-hour shift a minor was on Level 3 Supervision and housed in the SHU. Specifically, the CMYC SHU managers did not complete Enhanced Supervision Observation Forms for 21 (22%) of the 95 shifts reviewed.

29C – Enhanced Supervision Level 2

This Provision applies to the five camps/units that had minors on Level 2 Enhanced Supervision (Level 2 Supervision) at the time of our review. Level 2 Supervision is required for minors who are not actively suicidal, but may experience persistent suicidal ideations.

Two (40%) of the five camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 82%. The managers at the three camps/units did not always ensure that Safety Check Sheets were completed for each eight-hour shift a minor was on Level 2 Supervision and housed in a SHU. Specifically, Probation managers did not complete Safety Check Sheets for 35 (33%) of the 106 shifts reviewed.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 30: Supervision of Youth at Risk of Self-Harm

The County shall sufficiently supervise youth newly assigned to a Camp, youth in seclusion, and other youth at heightened risk of self-harm to maintain their safety.

This Provision applies to the four camps and one specialized unit that had minors on Level 1 Enhanced Supervision (Level 1 Supervision) at the time of our review. Level 1 Supervision is required for all minors who are not at risk of suicide or self-injury.

Average Compliance Level: 94%

Comments:

Four (80%) of the five camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp Gonzales) achieved a compliance level of 84%. The camp managers did not always ensure that Safety Check Sheets were completed for each eight-hour shift a minor was on Level 1 Supervision and housed in a SHU. Specifically, the managers did not complete Safety Check Sheets for 13 (68%) of the 19 shifts reviewed.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 31: Suicide Precautions for Youth Awaiting Transfer to Another Facility

The County shall develop and implement policies, practices, and procedures to ensure that adequate suicide precautions are provided to youth who are awaiting transfer to another facility for assessment (mental health assessment).

This Provision applies to the six camps/units that had minors on Level 4 Enhanced Supervision (Level 4 Supervision) at the time of our review. Level 4 Supervision is required for minors who are actively suicidal, or have engaged in serious self-harming behavior, and have been transferred from the camps/units to a higher level of care (e.g., psychiatric emergency care facility) for psychiatric assessment.

Average Compliance Level: 82%**Comments:**

Three (50%) of the six camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 70%. The managers at the three camps/units did not always ensure that Enhanced Supervision Observation Forms were completed, or were completed entirely for minors requiring Level 4 Supervision. In addition, for two of the units, the managers did not always ensure that SIRs were completed, or were completed entirely, for two (100%) minors who were on Level 4 Supervision and were transferred out of the facility.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 32: Training (Suicide Prevention)

The County shall ensure that all Camp staff who work with youth are sufficiently trained in suicide prevention so that they understand how to prevent and respond to crises, including practical matters, such as the location and use of a cut-down tool if a youth attempts to hang him/her self.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 88%

Comments:

Ten (63%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining six camps/units achieved an average compliance level of 77%. Probation management developed a training class on suicide prevention. However, Probation management did not ensure that all staff at the six camps/units received the training. Specifically, 20% of Probation Officers and 30% of non-peace officer staff from DMH, LACOE, and JCHS assigned to the six camps/units did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 34: Screening

The County shall develop and implement policies, procedures, and practices for initial mental health screening to allow the identification of previously diagnosed and potentially existing mental health or substance abuse disorders, including potential suicidality. Such screening shall take place within 48 hours prior to a youth's arrival at a Camp, or within 24 hours after a youth's arrival at a camp.

This Provision applies to thirteen camps and two specialized units.

Average Compliance Level: 99%

Comments:

All fifteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 45: Staff Understanding of Mental Health and Developmental Disability Needs

The County shall ensure that all staff working with youth residents have the skills and information necessary to understand behaviors of, engage in appropriate interactions with, and respond to needs of, youth with mental illness and developmental disabilities.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 7%

Comments:

Probation management developed a training class that covered the requirements of this Provision. However, Probation management did not ensure that all staff working at the facilities completed the training. Specifically, Probation, LACOE, and JCHS management provided documentation to show that only 10% of the staff assigned to the camps had completed the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011. However, our review indicated a compliance rate of 7%. Probation explained that the discrepancy was because of the timing of our review. Specifically, the Department indicated that they completed training the staff on the requirements of this Provision during October 2011, and our review only covered the training records through September 2011.

Provision 46: Discharge Summaries

The County shall provide aftercare planning and discharge summaries for youth leaving the facility who have, or have had, open mental health cases at a camp to facilitate treatment in future placements.

This Provision applies to thirteen camps and one specialized unit.

Average Compliance Level: 97%

Comments:

Eleven (79%) of the fourteen camps/unit achieved substantial compliance of 90% or more. The remaining three camps achieved an average compliance level of 86%. The directors at the three camps did not always ensure that discharge summaries were completed for each minor discharged from the camp. Specifically, the camp directors did not provide discharge summaries for six (20%) of the 30 minors released from the three camps.

The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

**DOJ Settlement Agreement Provision
Monitored by the Auditor-Controller
Compliance Level Summary
For Monitoring Reviews Completed Through November 30, 2011**

Provision	Description	Monitoring Results (1)			
		Feb 28, 2011	May 31, 2011	Aug 31, 2011	Nov 30, 2011
9 (3)	Protection from Abusive Practices	N/A	N/A	N/A	N/A
10	Use of Force	22%	95%	96%	96%
11	Chemical Restraint	50%	95%	93%	90%
12	Use of Force Review	50%	88%	89%	94%
13 (3)	Threat and Intimidation	N/A	N/A	N/A	N/A
14	Consumption of Alcohol by Staff	85%	85%	82%	93%
15 (2)	Staffing	N/A	N/A	N/A	N/A
16 (4)	Orientation	95%	97%	99%	99%
17 (2)	Rehabilitation & Behavior Management	N/A	N/A	N/A	N/A
18	Staff Training and Supervision of Youth	19%	61%	89%	90%
19	Youth-on-Youth Violence (YOYV)	83%	92%	92%	96%
20	Child Abuse Reporting	34%	51%	88%	89%
21	Child Abuse Investigation	40%	48%	62%	84%
22 (3)	Classification	33%	76%	N/A	N/A
23	Grievance System	91%	92%	98%	97%
24 (4)	Youth Movement Between Probation Camps and/or Halls	42%	80%	98%	96%
25 (4)	Development and Implementation of Policy (Suicide Prevention)	88%	96%	96%	98%
27 (2)	Management of Suicidal Youth	N/A	N/A	N/A	N/A
29	Documentation of Suicide Precautions	69%	85%	66%	82%
30	Supervision of Youth at Risk of Self Harm	N/A	N/A	N/A	94%
31	Suicide Precautions for Youth Awaiting Transfer to Another Facility	N/A	N/A	N/A	82%
32	Training (Suicide Prevention)	38%	57%	86%	88%
34	Screening	91%	89%	97%	99%
43 (2)	Substance Abuse	N/A	N/A	N/A	N/A
45	Staff Understanding of Mental Health and Developmental Disability Needs	37%	42%	8%	7%
46	Discharge Summaries	53%	87%	97%	97%
Average Overall		58%	78%	85%	88%

Footnote Legend

- (1) Provisions that are in substantial compliance (achieved a 90% or better compliance level) are highlighted in green. Provisions with compliance levels that dropped from the previous review are highlighted in red.
- (2) Probation and the DOJ Monitor had not finalized the monitoring tools needed to measure compliance with the Provision. As a result, the Provision was not included in our review.
- (3) Probation indicated that we are no longer responsible for monitoring this provision. Specifically, Probation indicated that the DOJ is relying on their own observations and the results of Probation's internal reviews to evaluate compliance.
- (4) The DOJ Monitor indicated that Probation fully implemented this provision by maintaining "substantial compliance" with this provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this provision to once a year.

**DOJ Settlement Agreement Provision
Monitoring Results
For The Monitoring Period September Through November 2011**

Date			Compliance Percentage for A-C Monitored Provisions (1)																			
Camp/Unit	Review Date	Period Reviewed	10	11	12	14	16	18	19	20	21	23	24	25	29	30	31	32	34	45	46	Average
Camp Gonzales	9/8/2011	June-Sept 2011	90%	N/A	90%	79%	100%	90%	98%	80%	N/A	80%	98%	92%	84%	84%	96%	84%	100%	16%	100%	86%
Camp Miller	9/13/2011	Aug-Sept 2011	99%	N/A	96%	82%	96%	100%	94%	95%	N/A	100%	96%	96%	80%	N/A	N/A	94%	100%	18%	83%	89%
Camp Kilpatrick	9/15/2011	Aug-Sept 2011	96%	N/A	65%	83%	95%	95%	79%	74%	N/A	93%	98%	98%	78%	96%	N/A	93%	100%	14%	100%	85%
Camp Munz	9/20/2011	Aug-Sept 2011	97%	N/A	77%	84%	100%	93%	90%	87%	N/A	100%	100%	98%	100%	N/A	91%	78%	100%	6%	85%	87%
Camp Mendenhall	9/22/2011	Aug-Sept 2011	95%	N/A	98%	97%	100%	100%	96%	95%	N/A	92%	97%	98%	85%	N/A	N/A	96%	100%	8%	89%	90%
Camp Scott	9/26/2011	July-Sept 2011	97%	N/A	95%	99%	100%	87%	96%	86%	N/A	100%	94%	99%	87%	99%	94%	96%	100%	7%	100%	90%
Camp Scudder	9/28/2011	July-Sept 2011	100%	N/A	100%	94%	99%	97%	100%	92%	N/A	96%	100%	99%	88%	N/A	N/A	94%	93%	11%	100%	91%
Security Unit at CMYC	10/4/2011	Aug-Sept 2011	86%	90%	100%	98%	N/A	84%	100%	95%	N/A	N/A	N/A	95%	N/A	N/A	N/A	93%	N/A	28%	N/A	87%
Special Housing Unit at CMYC	10/4/2011	Aug-Sept 2011	100%	N/A	100%	N/A	N/A	97%	100%	100%	N/A	99%	N/A	100%	74%	94%	50%	100%	96%	0%	N/A	85%
Camp McNair	10/6/2011	Aug-Sept 2011	97%	N/A	98%	N/A	94%	83%	100%	100%	N/A	100%	99%	98%	80%	N/A	N/A	98%	93%	0%	100%	89%
Camp Jarvis	10/18/2011	Aug-Sept 2011	95%	N/A	96%	N/A	98%	88%	100%	93%	N/A	93%	95%	97%	90%	N/A	N/A	93%	100%	0%	100%	88%
Camp Onizuka	10/20/2011	Aug-Sept 2011	98%	N/A	95%	N/A	100%	89%	100%	96%	N/A	100%	98%	100%	95%	N/A	N/A	95%	100%	0%	100%	90%
Camp Paige	10/25/2011	Sept-Oct 2011	96%	N/A	95%	99%	100%	87%	96%	80%	N/A	100%	73%	99%	50%	N/A	N/A	78%	100%	0%	100%	84%
Camp Afterbaugh	10/27/2011	Sept-Oct 2011	99%	N/A	100%	99%	98%	85%	94%	75%	N/A	100%	100%	99%	63%	N/A	N/A	56%	100%	0%	100%	85%
Camp Rockey	11/8/2011	Sept-Nov 2011	98%	N/A	100%	99%	99%	85%	90%	86%	N/A	100%	100%	99%	81%	95%	70%	85%	100%	2%	100%	88%
Dorothy Kirby Center	11/10/2011	Sept-Nov 2011	100%	N/A	96%	98%	100%	86%	100%	86%	N/A	100%	99%	97%	100%	N/A	89%	82%	100%	9%	100%	90%
CASIU	11/16/2011	Aug-Oct 2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	84%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	84%
DOJ Compliance Bureau	11/21/2011	Sept-2011	N/A	N/A	90%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	90%
Average Compliance Percentage			96%	90%	94%	93%	99%	90%	96%	89%	84%	97%	96%	98%	82%	94%	82%	88%	99%	7%	97%	88%

Footnote Legend

N/A Provision is not applicable to this camp/unit.

(1) See Attachment 2 for the title of each provision.